

December 4, 2001

Mr. Carl L. Goldstein
US EPA Region 9
Pacific Insular Area Program (CMD-5)
75 Hawthorne Street
San Francisco, CA 04105

**RE: Request To Temporarily Halt Ocean Dumping & Test Modified
Wastewater Process**

Dear Mr. Goldstein:

COS Samoa Packing has been informed by Blue North, owner of F/V Tasman Sea, that extensive repairs will be necessary for the vessel taking a period of 3 weeks. It is also necessary before repairs are made that the vessel finish emptying our on-site sludge tank and finish cleaning the vessel wells. We have planned for all of this to occur between December 22 through January 12.

COS Samoa Packing is in agreement that these repairs are necessary to allow the F/V Tasman Sea to continue to operate safely and in conformity with the Ocean Dumping Permit. During the last week of repairs we request our plant be allowed to operate while testing a new method of processing sludge through a technique of blending into fish meal. The proposed schedule would be as follows:

Production Downtime: Dec. 22, 2001 thru Jan. 5, 2002

Production w/ Blending of Sludge: Jan. 6, 2002 thru Jan. 12, 2002

COS Samoa Packing currently processes approximately 1.1 million gallons per day through the DAF at the wastewater treatment facility. In addition, approximately 100,000 gallons per day of high strength wastewater; consisting of pre-cooker water, fish meal press liquor, and sludge from the DAF is sent to the sludge vessel and dumped at sea.

The temporary changes to the process being requested will consist of allowing the pre-cooker water and fish meal press liquor to mix with the normal process wastewater and go to the DAF. The sludge obtained from the DAF will be pumped back to the fish meal plant for mixing into the scrap going into the meal drier. It should be noted that currently our meal plant does not have a centrifuge to recover oil from the press liquor. During this time, special polymers will be utilized in the DAF that meet GRAS (general recognized as safe) approved polymers. This test will give us valuable information to allow us to

investigate further options for the future that could result in eliminating ocean dumping. We also would like to request your requirements for effluent monitoring if different from normal during this time period.

The NPDES permit and Ocean Dumping permit are integral parts of our wastewater management program for meeting water quality standards in American Samoa. The sludge boat will be repaired to continue operation while both Starkist and COS Samoa Packing investigate other options and backups for the F/V Tasman Sea.

Please call me at 858-597-4212 or email at jcox@cosintl.com if you have any questions. Please consider our request and advise as soon as possible.

Sincerely,

James L. Cox, Director of Engineering
Chicken of the Sea International

Cc: Peter Peshut, ASEPA
Herman Gebauer, Sampac
Brett Ransby, Sampac